

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(BEAUFORT DIVISION)

TINA RENEE BAIREFOOT, DAE'QUANDREA
TREVELL NELSON and NATHAN LEE FOX,
Plaintiffs,

v.
CITY OF BEAUFORT, SOUTH CAROLINA
TOWN OF BLUFFTON, SOUTH CAROLINA
Defendants.

Case No. 9:19-cv-2759-RMG

Motion

**in Support of
Pro Hac Vice Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Ezekiel Reifler Edwards be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

- ☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; X ☐ does not intend to oppose
- ☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

American Civil Liberties Union of South Carolina

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Name of Local Counsel

s/Susan K. Dunn

Signature of Local Counsel

Local Counsel for the

District of South Carolina

revised 09/19/05